



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

JJD:JLG
F. #2020R00632

*271 Cadman Plaza East
Brooklyn, New York 11201*

May 14, 2025

REQUEST TO BE FILED UNDER SEAL

The Honorable Joan M. Azrack
United States District Judge
United States District Court
Eastern District of New York
100 Federal Plaza
Central Islip, New York 11722

Re: United States v. Vladimir Antonio Arevalo-Chavez
Criminal Docket No. 22-429 (JMA)

Dear Judge Azrack:

The government respectfully submits this letter: (1) to provide the Court and counsel for defendant Vladimir Antonio Arevalo-Chavez with copies of certain Salvadoran charging instruments and arrest warrants, as directed in the Court's May 1, 2025 Order; and (2) to implore the Court to grant the government's unopposed request to dismiss the indictment¹ as soon as possible, if not immediately.

Attached hereto are: (1) an INTERPOL Red Notice, issued February 19, 2019, for the defendant's arrest (Exhibit A);² (2) an arrest warrant, issued in connection with the charge of Terrorist Organizations (Organizaciones Terroristas), document number 3622, Specialized Investigative Court B of San Salvador (Juzgado Especializado de Instrucción B de San Salvador), dated May 29, 2018 (Exhibit B);³ and (3) an arrest warrant, issued in connection with the defendant's conviction in absentia for the crime of Illicit Associations (Agrupaciones Ilícitas), for which he received a sentence of fourteen years' imprisonment, and the crime of Aggravated

¹ The sole, substantive difference is that the government seeks dismissal without prejudice, whereas the defendant consents to the dismissal, but seeks that dismissal with prejudice.

² The United States National Central Bureau has confirmed that this Red Notice is active.

³ The defendant is subject number 53, on page 9. This is the charge for which the Red Notice issued.

Homicide (Homicidio Agravado), for which he received a sentence of 25 years' imprisonment, document number 29, Fifth Court Against Organized Crime, Judge Two, dated January 6, 2025 Exhibit C).⁴ These documents were successfully obtained with the assistance of the Department of Justice's Violent Crime and Racketeering Section, the U.S. Embassy in San Salvador, the Federal Bureau of Investigation's Legal Attaché and Transnational Anti-Gang Task Force, and the U.S. Department of Homeland Security, Immigration and Customs Enforcement, Enforcement and Removal Operations.

The government has been informed that to obtain the additional materials we have requested for all of the charges delineated in its April 30, 2025 letter to the Court, the Government of El Salvador has required a formal request pursuant to the Mutual Legal Assistance Treaty ("MLAT"). As the Court is likely aware, this cumbersome and extremely lengthy procedure would take an exorbitant amount of time. The request would necessarily move through the Department of Justice's Office of International Affairs, as well as the Department of State, before it could then be transmitted through diplomatic channels to the authorities in El Salvador, which would then evaluate and respond to the request.

The government respectfully submits that such further delay is unwarranted, especially in light of the documents which the government has already obtained and provided by exhausting all other channels reasonably available. Further, such delay would substantially impede critical foreign policy, geopolitical and national security concerns of the United States on which the instant motion to dismiss is based. Indeed, no additional documents or materials obtained from the Government of El Salvador would change the fact that the defendant is wanted there for crimes that were charged years before this case was brought. Further, because the government has provided specific and non-conclusory justifications for the instant motion, pursuant to Rule 48(a) of the Federal Rules of Criminal Procedure, it is respectfully submitted that the Court should have no hesitancy in ruling. Finally, the defendant has now effectively received the seven-day delay that he sought in his April 23, 2025 motion—indeed, since that motion was filed, *20 days* have elapsed.

Accordingly, the government implores the Court to grant its motion to dismiss without prejudice, which has been pending for well over a month now, and which the defendant does not oppose (other than to argue that the dismissal should be with prejudice).

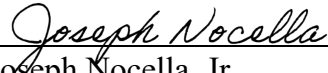
Finally, the government respectfully requests the continued sealing of all filings related to the motion to dismiss, including this letter. These filings include the details of charges pending against the defendant in a foreign country, which may not have been made public there. Therefore, in an abundance of caution, to protect the integrity of the foreign prosecutions, and for

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Exhibit C also contains a draft translation of the Spanish language document.

the reasons set forth in the government's previous filings regarding operational security, the government respectfully requests that this letter be filed and maintained under seal.

Respectfully submitted,



Joseph Nocella, Jr.
United States Attorney
Eastern District of New York

Enclosures

cc: Louis M. Freeman, Esq. (by email)
Thomas H. Nooter, Esq. (by email)